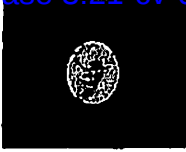


C

2020

- i. Lawful Standing and Government Status of Mund Bareefan Clan Indigenous Native American Association of Nations. (Exhibit “RRR”)
- ii. Richard Weinstein Solicitation mailed to 1361 S. 46th Street regarding Complaint in Ejectment/Ebiction. (Exhibit “OOO”)
- iii. Case 200700235 (Exhibit “PPP”)
- iv. Case 200700235 Default Order (Exhibit “RRR”)





**From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)**

Date 8/3/2020

**With regard to the lawful standing of the Mund Bareefan Clan and the
Indigenous Native American Association of Nations' tribes and clans :**

To: Honorable Judge, Judge Terre Fratesi

I am Black-Hawk H. Thunderbird, Most Principal Chief of The Mund Bareefan
Clan/Indigenous Native American Association of Nations (MBC/INAAN).

I respectfully request that this Honorable Court yield jurisdiction in this matter to
our tribal council in the State of Tennessee.

I submit the following communication as a friend to the court and with respect.

I have attached a color copy of the Authentication Certificate, and the "Brief in
Support" section of said agreement. I am legal custodian of the attached
certificate. I have also attached certified copies of certification from the State
of Tennessee, and certification from our original indigenous homeland in the
State of Georgia.

We are Guale-Yamassee Native Americans a US Department of State
AUTHENTICATED INDIGENOUS TRIBAL ENTITY. United States Authentication
February 11th. 2004.

Mund Bareefan Embassy Clan is outside the BIA yet is acknowledged in and by
the United States and all US States and jurisdictions as an authentic Indigenous
Native American clan/tribe that has secured the Rights of Self-Determination
with a constructive agreement between Mund Bareefan Embassy Clan, and
the US Department of State.



**From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)**

The Tanasi Yamassee Tribe in the State of Tennessee is one of our associated tribes and is in full rights and protections of indigenous rights as outlined in our law, and similar to the US INDIAN CHILD WELFARE LAW/ACT.

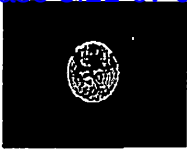
Our tribal councils, agencies, its official departments, our officially associated tribes and representatives; our official policies and this instrument is supported by our constructive agreement made between the "United States" Department of State, and Mund Bareefan Clan on February 11th, 2004, made in accord with our tribal policies and the policies of the United States Department of State. This said agreement can be verified through the our INARS data authentication retrieval and tracking system (DARTS)*; as well as at the "DARTS" data base at the US Department of State Authentication office. * (Document Authentication Retrieval and Tracking System)

2 FAM 1291.5 Processing (TL: GEN-313; 08-18-2004) (The United States
FOREIGN AND DOMESTIC AFFAIRS MANUEL = FAM)

The Authentications Office tracks all correspondence and documents through the Document Authentication, Retrieval, and Tracking Systems (DARTS). A case service number is assigned to all requests received in the Authentications Office. This service number appears on all authentication certificates and tracks all aspects of the authentication process, as well as fees collected, and is used as an effective method for the Authentications Office's internal control process.

There has been some question made with regard to public policy.

2 FAM 1291.2 Scope and Policy (TL: GEN-313; 08-18-2004)



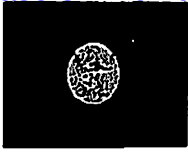
**From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)**

- a. The Authentications Office authenticates a variety of documents from commercial organizations, private citizens, and officials of Federal and State governments. Documents include, but are not limited to, company bylaws, powers of attorney, trademark, diplomas, treaties, warrants, extraditions, agreements, certificates of good standing, and courier letters.
- b. It will not authenticate documents that are contrary to public policy or are for an improper or unlawful purpose (see 22 CFR 131.1).

PART 131—CERTIFICATES OF AUTHENTICATION Title

22: Foreign Relations

All non-judicial records or books kept in any public office of any State, Territory, or Possession of the United States, or copies thereof, shall be proved or admitted in any court or office in any other State, Territory, or Possession by the attestation of the custodian of such records or books, and the seal of his office annexed, if there be a seal, together with a certificate of a judge of a court of record of the county, parish, or district in which such office may be kept, or of the Governor, or secretary of state, the chancellor or keeper of the great seal, of the State, Territory, or Possession that the said attestation is in due form and by the proper officers.

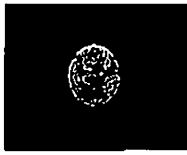


**From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)**

Treatment of this type notification to "all" the tribunals and public offices of the United States, "and of the Sevels States", is outlined in chapter 2 section 113 of the USC. I respectfully refer to a review of UNITED STATES Code Title 1

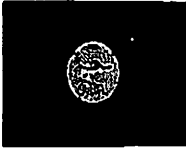
"The edition of the laws and treaties of the United States, published by Little and Brown, and the publications in slip or pamphlet form of the laws of the United States issued under the authority of the Archivist of the United States, and the Treaties and Other International Acts Series issued under the authority of the Secretary of State shall be competent evidence of the several public and private Acts of Congress, and of the treaties, international agreements other than treaties, and proclamations by the President of such treaties and international agreements other than treaties, as the case may be, therein contained, in all the courts of law and equity and of maritime jurisdiction, and in all the tribunals and public offices of the United States, and of the several States, without any further proof or authentication thereof."

SGA Black H. Thunderbird



**From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)**

ATTACHMENTS



From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)

Copy Certification # 110832020-1

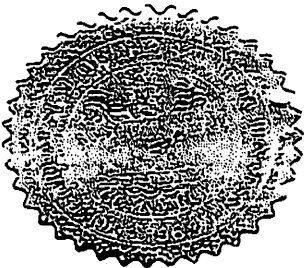


Tre Hargett
Secretary of State

Division of Business Services
Department of State
State of Tennessee
312 Rosa L. Parks AVE, 6th FL
Nashville, TN 37243-1102

CERTIFICATE OF AUTHENTICATION

I, TRE HARGETT, Secretary of State of the State of Tennessee, do hereby certify that BRENDA WYNN whose signature appears on the attached certificate, is (or was) at the time of signing same, the legally elected, commissioned, qualified, and acting COUNTY CLERK OF DAVIDSON COUNTY, TENNESSEE, authorized to take acknowledgements, and this person's official act as such, is entitled to full faith and credit; and I further certify that to the best of my knowledge and belief the signature to the attached certificate is the genuine signature of said BRENDA WYNN, COUNTY CLERK OF DAVIDSON COUNTY, TENNESSEE at the time of signing.



In Witness Whereof, I have hereto affixed my signature and the Great Seal of the State of Tennessee, at Nashville, this 8th day of February in the year of our Lord Two Thousand Seventeen.

Tre Hargett
Secretary of State

by *Alexia P. Williams*

Document # 17-02088

To verify authenticity, visit <http://tnbear.tn.gov/apostille/verify.aspx> and enter the document # from this certificate. For further information please contact the Business Services Division at (615) 741-0538.



From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)

Copy Certification # 110832020-2



By His Excellency SONNY PERDUE

GOVERNOR OF THE STATE OF GEORGIA
OFFICE OF THE GOVERNOR, ATLANTA, GEORGIA

To All whom these Presents shall Come -- Greeting,

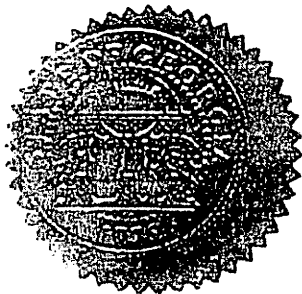
Know Ye, THAT

MARIE CHANEY

whose official signature appears to the instrument of writing here to annexed, was at the time of attesting the same therein, the duly appointed deputy clerk of the Superior Court of DeKalb County, Georgia, as appears from the Records of this Department, and that her true location is in due form *Exhibited* to the faith, credit and authority is and ought to be held and given to her name.

I further certify that the Secretary of State of the State of Georgia is the true owner of the Great Seal of said state.

Witness my hand and the Seal of the Executive Department of the State of Georgia, at Atlanta, Georgia, this 10th day of January, 2021.



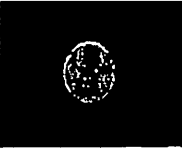
[Signature]
Secretary of State

[Signature]
Governor

Executive Department

Atlanta, Georgia, January 10, 2021

[Signature]
Executive Secretary



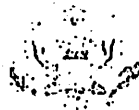
From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)

Copy Certification # 110832020-3



United States of America

C

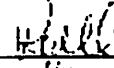


DEPARTMENT OF STATE

To all to whom these presents shall come, Greetings:

I Certify That the enclosed document, signed by the President
of the United States of America, and the Secretary of State,
is entitled to full faith and credit.

The enclosed document, signed by the President of the United States,
and the Secretary of State, is a true and correct copy of the
original document, and the same is hereby certified and
guaranteed by the Secretary of State, and the Assistant
Secretary of State, of the said Department,
at the Department of State, in the District of
Columbia, this 1st day of February, 2004.



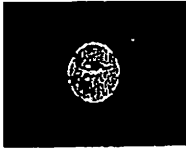
Secretary of State

For the Secretary of State, Made up
and signed by the Secretary of State,
and the Assistant Secretary of State,
at the Department of State, in the District of
Columbia, this 1st day of February, 2004.

*For the contents of the enclosed document, the Department assumes no
responsibility.

This certificate is not valid if it is removed or altered in any way whatsoever.





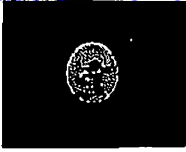
From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)

Copy Certification # 110832020-4

Sections of the Brief in Support presented to and certified by the US Department of State, for the completion of authentication with the United State et al,

"The Yamassee Native American Government; MT. 'Arafat Embassy, (hereinafter (MBC/INAAN) and "we") as do other Governments and their Embassies require the U.S. Department of State to authenticate documents to be used in the United States of America for said documents to be considered legal. Yamassee Native American Government Representatives/Diplomats are not limited to or required to carry US governmental or any other foreign governments issued licensing, such as but not limited to apostilles, diplomas, birth certificates, passports, marriage licenses, driver's licenses, vehicle registration plates and so on. Diplomats of the Yamassee Native American Government "MT. 'Arafat Embassy" are being inconvenienced by US Governmental and private employees. Yamassee Native American Government Officials and MT. 'Arafat Embassy Personnel carry very specific identification papers which are recorded with our data base at the ISMRS and all of the other agencies required by the US State Department for the authentication process to be complete. This is a clear honest communication of our intent towards co-operation and for the protection of both the Yamassee Native American Government, and the US Government. The documents including our passports will be used in the United States of America and when necessary, internationally".

Article 31: "Indigenous people, as a specific form of exercising their right to self-determination, have the right to autonomy or self-government in matters relating to their internal and local affairs, including culture, religion, education, welfare, economics activities, land and resourced, management, environment and entry by non-members, as well as ways and means for financing these autonomous functions."



**From the Desk of the Supreme Grand Chief Black-Hawk H. Thunderbird of
Mund Bareefan Clan/Indigenous Native American Association of Nations
(MBC/INAAN)**

"The Of Bill of Rights Of MBC/INAAN Indigenous Peoples"

Article 36: Indigenous people have the right to the recognition, observance and enforcement of treaties, agreements and other constructive arrangements concluded with States or their successor, according to their original sprit of intent, and to have States honor and respect such treaties, agreements and other constructive arrangements. Conflicts and disputes which cannot otherwise be settled should be submitted to competent international bodies agreed to by all parties concerned."

I respectfully request that this Honorable Court yield jurisdiction in this matter to our tribal council pursuant to our pre-existing agreement. We thank you for your diligence with regard to the welfare of our indigenous national/child.

Thank you,

Most Principal Chief Black Hawk H. Thunderbird



Richard F. Weinstein, Esquire
705 West Haverford Road, Suite 1
Bryn Mawr, PA 19010-3128
(610) 896-3700
(610) 220-5910 any time
(610) 896-0347 Fax
rfwlaw1@comcast.net
www.safehavenpa.com

July 31, 2020

OCCUPANT(S)
1361 SOUTH 46TH STREET
PHILADELPHIA PA 19143

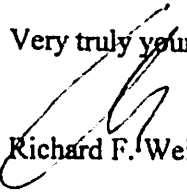
A review of your Court's records indicates that someone has filed a Complaint in **EJECTMENT (EVICTION)** against all residents of this house. This usually occurs when the property was sold at Sheriff's Sale within the last few months. Although your residence may have been sold at a recent Sheriff's Sale **YOU CAN CONTINUE TO REMAIN IN YOUR HOME FOR MANY MONTHS AT LITTLE COST**. The next important legal step after that sale is when a Complaint in **EJECTMENT (EVICTION)** is served on you. This happens several weeks or even months after the Sheriff's Sale took place. **CONTACT ME IMMEDIATELY WHEN YOU ARE SERVED WITH THE COMPLAINT IN EJECTMENT.**

WE WILL DEFEND YOU AGAINST THIS LAWSUIT WHICH WILL ENABLE YOU TO REMAIN IN YOUR HOME FOR SIX ADDITIONAL MONTHS.

Please act to protect your interests and continue to reside in your home. Contact us as soon as possible in order to preserve all of your hard-earned rights under our laws. I would be happy to personally speak with you without any cost to you whatsoever. I look forward to hearing from you.

CONTACT US at (610) 896-3700 or call us at our any time number (610) 220-5910.

Very truly yours,

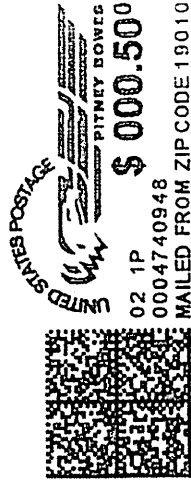

Richard F. Weinstein

RFW:jsf
enclosures

SUSAN

Richard F. Weinstein, Esquire
705 West Haverford Road, Suite 1
Bryn Mawr, PA 19010-3128

PHILADELPHIA
PA 191
OCT 14 1950
PM 7 11



OCCUPANT(S)
1361 SOUTH 46TH STREET
PHILADELPHIA PA 19143
|||||.....

19143-382761

-

7/31/2020

Civil Docket Report



No Items in Cart LOGIN

Civil Docket Report

A \$5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID: 200702235
Case Caption: NIS LAR LLC VS DOE ETAL
Filing Date: Friday , July 31st, 2020
Court: RENT, LEASE & EJECTMENT
Location: City Hall
Jury: NON JURY
Case Type: EJECTMENT
Status: ACTIVE CASE

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case motions

No case motions were found.

Case Parties



Seq #	Assoc	Expn Date	Type	Name
1			ATTORNEY FOR PLAINTIFF	KRIK, JUSTIN L
Address:	1500 JOHN F KENNEDY BLVD SUITE 630 PHILADELPHIA PA 19102 (267)831-3180	Aliases:	none	
2	1		PLAINTIFF	NIS LAR LLC
Address:	4323 SPRUCE STREET PHILADELPHIA PA 19104	Aliases:	none	
3			DEFENDANT	DOE, JOHN
Address:	1361 SOUTH 46TH STREET	Aliases:	none	

7/31/2020

Civil Docket Report

PHILADELPHIA PA 19143			
4		DEFENDANT	OCCUPANT, UNKNOWN
Address:	1361 SOUTH 46TH STREET PHILADELPHIA PA 19143	Aliases:	none

Docket Entries

Filing Date/Time	Docket Type	Filing Party	Disposition Amount	Approval/Entry Date
31-JUL-2020 10:58 AM	ACTIVE CASE			31-JUL-2020 11:09 AM
Docket Entry:	E-Filing Number: 2007061136			
31-JUL-2020 10:58 AM	COMMENCEMENT OF CIVIL ACTION	KRIK, JUSTIN L		31-JUL-2020 11:09 AM
Documents:	Click link(s) to preview/purchase the documents Final Cover <div style="float: right; border: 1px solid black; padding: 2px;">  Click HERE to purchase all documents related to this one docket entry </div>			
Docket Entry:	none.			
31-JUL-2020 10:58 AM	COMPLAINT FILED NOTICE GIVEN	KRIK, JUSTIN L		31-JUL-2020 11:09 AM
Documents:	Click link(s) to preview/purchase the documents Complaint in Ejectment - 1361 S 46th St.pdf <div style="float: right; border: 1px solid black; padding: 2px;">  Click HERE to purchase all documents related to this one docket entry </div>			
Docket Entry:	COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED. PREMISES BEING 1361 S 46TH STREET, PHILADELPHIA.			

[▶ Case Description](#)[▶ Related Cases](#)[▶ Event Schedule](#)[▶ Case Parties](#)[▶ Docket Entries](#)[Search Home](#)[Return to Results](#)



NIS LAR LLC	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
	:	
v.	:	JULY TERM, 2020
	:	
	:	NO.: 002235
JOHN DOE	:	
and	:	
UNKNOWN OCCUPANT	:	
Defendant(s).	:	

ORDER

AND NOW this day of , 2020, upon consideration of Plaintiff's Motion for Default Judgment and Order Upon Judgment of Default in accordance with Pa.R.C.P. 1037(c) and (d) and response thereto, it is hereby ORDERED and DECREED as follows:

1. Judgment is hereby entered in favor Plaintiff, NIS LAR LLC, and against Defendants, JOHN DOE AND UNKNOWN OCCUPANTS, upon default for failure to timely plead to Plaintiff's Complaint; and
2. The Prothonotary, upon Plaintiff's praecipe, shall issue a Writ of Possession for the Subject Premises located at 1361 South 46th Street, Philadelphia, PA 19143.

BY THE COURT:

J.

KRIK LAW
 BY: JUSTIN L. KRIK, ESQUIRE
 ATTORNEY ID NO: 203006
 1500 JOHN F. KENNEDY BLVD., STE. 630
 PHILADELPHIA, PA 19102
 PHONE: (267) 831-3180
 FAX: (215) 309-5502

ATTORNEY FOR PLAINTIFF

NIS LAR LLC	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
	:	
v.	:	JULY TERM, 2020
	:	
	:	NO.: 002235
JOHN DOE	:	
and	:	
UNKNOWN OCCUPANT	:	
Defendant(s).	:	

**MOTION FOR JUDGMENT OF DEFAULT AND ASSESSMENT OF DAMAGES
 IN ACCORDANCE WITH PA.R.C.P. 1037 (C) AND (D)**

Plaintiff, NIS LAR LLC, by and through its attorney, Justin L. Krik, hereby moves this Court for an Order entering judgment against Defendants upon default in accordance with Pa.R.C.P. 1037(c) declaring that judgment is hereby entered in favor Plaintiff, NIS LAR LLC, and against Defendants, JOHN DOE AND UNKNOWN OCCUPANTS, upon default for failure to timely plead to Plaintiff's Complaint, and for the issuance of a Writ of Possession for the Subject Premises located at 1361 South 46th Street, Philadelphia, PA 19143, upon Plaintiff's praecipe for same, and in support thereof, aver as follows:

I. Plaintiff, NIS LAR LLC, became record owner of 1361 South 46th Street, Philadelphia, PA 19143 (the "Subject Premises") on March 16, 2020, having acquired title by Deed from Rochelle Bilal, Sheriff of the County of Philadelphia, recorded by the Commissioner of Records of the City of Philadelphia on March 16, 2020 at Document Identification Number 53646252 (the "Deed"). A true and correct copy of the Deed is attached hereto and made a part hereof as Exhibit "I".

2. Defendants, JOHN DOE and UNKNOWN OCCUPANTS, are adults individuals occupying the Subject Premises with no lawful right, title or interest in the Subject Premises.

3. On July 15, 2020, Plaintiff sent the Notice to Vacate Pursuant to PTFA of 2009 to the Defendants via regular mail. As of the date of this filing, Defendants have not responded and continue to occupy the property. A true and correct copy of the notice is attached hereto and made a part hereof as Exhibit "2".

4. On or about July 31, 2020, Plaintiff instituted this action against Defendants. A true and correct copy of the Complaint in Ejectment is attached hereto and made a part hereof as Exhibit "3".

5. The Complaint was served upon Defendants on August 27, 2020. A true and correct copy of the service affidavits are attached hereto and made a part hereof as Exhibit "4".

6. Notices Pursuant to Pa. R.C.P. 237.1 were mailed to the Defendants on September 23, 2020. A true and correct copy of the notices are attached hereto and made a part hereof as Exhibit "5".

7. Defendants have failed to plead to Plaintiffs' Complaint and the time for such pleading pursuant to Pa.R.C.P. 1026(a) has now expired.

8. This action is not subject to the stay required by the September 1, 2020 CDC Order as it is an action in ejectment of unauthorized occupancy and there was never a landlord/tenant relationship between Plaintiff and Defendants. A true and correct copy of Plaintiff's Affidavit in Connection with the CDC Order and Temporary Halt in Evictions to Prevent Further Spread of COVID-19 is attached hereto and made a part hereof as Exhibit "6".

9. Plaintiff seeks an Order for Default Judgment and issuance of a Writ of Possession upon the filing of Plaintiff's praecipe for same.

WHEREFORE, plaintiff prays and respectfully requests Judgment in its favor in the form of an Order attached hereto, as follows:

- a. Judgment is hereby entered in favor Plaintiff, NIS LAR LLC, and against Defendants, JOHN DOE AND UNKNOWN OCCUPANTS, upon default for failure to timely plead to Plaintiff's Complaint, and;
- b. The Prothonotary, upon Plaintiff's praecipe, shall issue a Writ of Possession for the Subject Premises located at 1361 South 46th Street, Philadelphia, PA 19143.

KRIK LAW

BY: /s/ Justin L. Krik
JUSTIN L. KRIK, ESQUIRE
ATTORNEY FOR PLAINTIFF

DATE: November 6, 2020

KRIK LAW
 BY: JUSTIN L. KRIK, ESQUIRE
 ATTORNEY ID NO: 203006
 1500 JOHN F. KENNEDY BLVD., STE. 630
 PHILADELPHIA, PA 19102
 PHONE: (267) 831-3180
 FAX: (215) 309-5502

ATTORNEY FOR PLAINTIFF

NIS LAR LLC	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
	:	
v.	:	JULY TERM, 2020
	:	
	:	NO.: 002235
JOHN DOE	:	
and	:	
UNKNOWN OCCUPANT	:	
Defendant(s).	:	

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF, NIS LAR LLC'S, MOTION
 FOR DEFAULT JUDGMENT AND ORDER UPON JUDGMENT OF DEFAULT AND
 ASSESSMENT OF DAMAGES
IN ACCORDANCE WITH P.A.R.C.P. 1037(C) AND (D)**

I. HISTORY OF THE CASE

Plaintiff, NIS LAR LLC, became record owner of 1361 South 46th Street, Philadelphia, PA 19143 (the "Subject Premises") on March 16, 2020, having acquired title by Deed from Rochelle Bilal, Sheriff of the County of Philadelphia, recorded by the Commissioner of Records of the City of Philadelphia on March 16, 2020 at Document Identification Number 53646252 (the "Deed"). A true and correct copy of the Deed is attached hereto and made a part hereof as Exhibit "1". Defendants, JOHN DOE and UNKNOWN OCCUPANTS, are adults individuals occupying the Subject Premises with no lawful right, title or interest in the Subject Premises.

On July 15, 2020, Plaintiff sent the Notice to Vacate Pursuant to PTFA of 2009 to the Defendants via regular mail. As of the date of this filing, Defendants have not responded and continue to occupy the property. A true and correct copy of the notice is attached hereto and made a part hereof as Exhibit "2".

On or about July 31, 2020, Plaintiff instituted this action against Defendants. A true and correct copy of the Complaint in Ejectment is attached hereto and made a part hereof as Exhibit “3”. The Complaint was served upon Defendants on August 27, 2020. A true and correct copy of the service affidavits are attached hereto and made a part hereof as Exhibit “4”. Notices Pursuant to Pa. R.C.P. 237.1 were mailed to the Defendants on September 23, 2020. A true and correct copy of the notices are attached hereto and made a part hereof as Exhibit “5”. Defendants have failed to plead to Plaintiffs’ Complaint and the time for such pleading pursuant to Pa.R.C.P. 1026(a) has now expired.

This action is not subject to the stay required by the September 1, 2020 CDC Order as it is an action in ejectment of unauthorized occupancy and there was never a landlord/tenant relationship between Plaintiff and Defendants. A true and correct copy of Plaintiff’s Affidavit in Connection with the CDC Order and Temporary Halt in Evictions to Prevent Further Spread of COVID-19 is attached hereto and made a part hereof as Exhibit “6”. Plaintiff seeks an Order for Default Judgment and issuance of a Writ of Possession upon the filing of Plaintiff’s praecipe for same.

II. STATEMENT OF QUESTIONS INVOLVED

I. Whether Plaintiff is entitled to an Order in accordance with Pa.R.C.P. 1037(c) entering judgment against Defendant for failure to respond to Plaintiff’s Complaint in a timely manner?

Suggested Answer: Yes, pursuant to Pa.R.C.P. 1037(c), in all cases, the Court, on Motion of a party may enter an appropriate judgment against a party upon default.

2. Whether Plaintiff is entitled to an Order in accordance with Pa.R.C.P. 1037(d) permitting, upon Plaintiff's praecipe, the Prothonotary to issue a Writ of Possession for the Subject Premises located at 1361 South 46th Street, Philadelphia, PA 19143?

Suggested Answer: Yes, pursuant to Pa.R.C.P. 1037(d), in all cases where equitable relief is sought, the Court shall enter an appropriate order upon judgment of default.

III. ARGUMENT

A. Plaintiff Is Entitled To The Entry Of A Default Judgment Against Defendant Where Defendant Has Failed To Plead In A Timely Manner After Proper Service Upon Him.

Pa.R.C.P. 1026(a) sets forth that "every pleading subsequent to the Complaint shall be filed within twenty (20) days after the preceding pleading . . ." On August 27, 2020, Defendant was served with Plaintiff's Complaint. A copy of the Affidavits of Service is attached hereto as Exhibit "4". More than twenty (20) days have passed since the service upon Defendant and Defendant has failed to plead to Plaintiff's Complaint which was properly served. Since more than twenty (20) days have passed since the service of the Complaint upon Defendant, Plaintiff is entitled to a default judgment against Defendant pursuant to Pa.R.C.P. 1037(c).

B. Plaintiff Is Entitled To The Entry Of An Order Permitting The Issuance Of A Writ Of Possession.

Because this is an action in Ejectment of the Defendants from the Subject Premises, the relief requested is possession. Pursuant to Pa.R.C.P. 1037(d) the Court shall enter an appropriate order; which, in this instance is to permit, upon Plaintiff's praecipe, the Prothonotary to issue a Writ of Possession.

IV. CONCLUSION

For the reasons set forth herein, Plaintiffs request that this Court enter an order upon the judgment by default and assess damages in accordance with the request contained in Plaintiff's

Complaint, in the form proposed hereto, ordering that Judgment be entered in favor of the Plaintiff, and that, upon Plaintiff's praecipe, the Prothonotary shall issue a Writ of Possession.

Respectfully Submitted,

KRIK LAW

BY: /s/ Justin L. Krik
JUSTIN L. KRIK, ESQUIRE
ATTORNEY FOR PLAINTIFF

DATE: November 6, 2020

KRIK LAW
BY: JUSTIN L. KRIK, ESQUIRE
ATTORNEY ID NO: 203006
1500 JOHN F. KENNEDY BLVD., STE. 630
PHILADELPHIA, PA 19102
PHONE: (267) 831-3180
FAX: (215) 309-5502

ATTORNEY FOR PLAINTIFF

NIS LAR LLC	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
	:	
v.	:	JULY TERM, 2020
	:	
	:	NO.: 002235
JOHN DOE	:	
and	:	
UNKNOWN OCCUPANT	:	
Defendant(s).	:	

CERTIFICATE OF SERVICE

I hereby certify that, on the date listed below, a true and correct copy of Plaintiff's

Motion for Default Judgment and Order upon the Judgment of Default in accordance with

Pa.R.C.P. 1037(c) and (d), by regular mail, as follows:

JOHN DOE
1361 South 46th Street
Philadelphia, PA 19143

UNKNOWN OCCUPANT
1361 South 46th Street
Philadelphia, PA 19143

KRIK LAW

BY: /s/ Justin L. Krik
JUSTIN L. KRIK, ESQUIRE
ATTORNEY FOR PLAINTIFF

DATE: November 6, 2020

eRecorded in Philadelphia PA Doc Id: 53646252
03/16/2020 12:37 PM Page 1 of 6 Rec Fee: \$256.75
Receipt#: 20-29523
Records Department Doc Code: DS
State RTT: \$859.51 Local RTT: \$2,817.47

1912-491

Know all Men by these Presents

THAT I, Rochelle Bilal, Sheriff of the County of Philadelphia in the Commonwealth of Pennsylvania, for and in consideration of the sum of ONE HUNDRED TWENTY-FIVE THOUSAND AND XX / 100 [\$125,000.00] dollars, to me in hand paid, do hereby grant and convey to NIS LAR LLC .

DESCRIPTION

BRT#: 272165800

Premises Being: 1361 S 46TH ST, PHILADELPHIA, PA 19143-3827

SEE ATTACHED LEGAL DESCRIPTION

The same having been sold, on the 7th day of January Anno Domini Two Thousand Twenty, after due advertisement, according to the law, under and by virtue of a Writ of Execution/DECREE issued out of the Court of Common Pleas as of May Term, Two Thousand Seventeen Number 3419 as the suit of:

MATRIX FINANCIAL SERVICES CORPORATION

VS.

MAY E. MCCLOUD AND VERA L. JONES

In witness whereof, I have hereunto affixed my signature this 3rd day of February Anno Domini Two Thousand Twenty.

**SEALED AND DELIVERED
IN THE PRESENCE OF:**

Richard Tyler

Witness

Rochelle Bilal, SHERIFF

BY

Jeffrey Harrison

Witness

Sommer Miller

Sommer Miller, Undersheriff

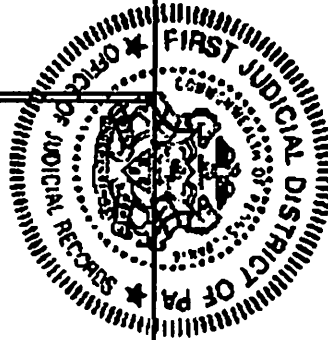
Commonwealth of Pennsylvania :
County of Philadelphia :

On this, the 03 Feb 2020, before me, the undersigned Officer, personally appeared ROCHELLE BILAL, BY HIS/HER UNDERSHERIFF SOMMER MILLER, Sheriff of the County of Philadelphia, known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he/she executed the same in the capacity therein stated and for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

Steven J. Wulko

Office of Judicial Records
Steven J. Wulko, Deputy Director



Book No. 1912
Writ No. 491
Control No. _____

Deed = Poll

Rochelle Bilal, SHERIFF

TO

NIS LAR LLC

MATRIX FINANCIAL SERVICES CORPORATION

VS.

MAY E. MCCLOUD AND VERA L. JONES

May. T. 2017

No. 3419



Premises:

1361 S 46TH ST
PHILADELPHIA, PA19143-3827

The Address of the within-named Grantee

4323 SPRUCE STREET

PHILADELPHIA, PA19104

On behalf of the Grantee

Rochelle Bilal, SHERIFF

Philadelphia Sheriff Office

Sheriff of the County of Philadelphia
Chief Inspector Richard Verrecchio
Witness
Real Estate/Settlement Dept.
Land Title Building
100 South Broad Street 5th Floor
Philadelphia, PA19110

REV-183 EX (2-15)



pennsylvania
DEPARTMENT OF REVENUE

Bureau of Individual Taxes
PO BOX 280603
Harrisburg, PA 17128-0603

**REALTY TRANSFER TAX
STATEMENT OF VALUE**

See reverse for instructions.

53646252 Page 4 of RECORDER'S USE ONLY

State Tax Paid

Book Number

Page Number

Date Recorded

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

A. CORRESPONDENT - All Inquiries may be directed to the following person:

Name Sheriff of the County of Philadelphia		Telephone Number (215) 686-3530	
Mailing Address Land Title Building 100 South Broad Street 5th Floor		City Philadelphia	State PA
		ZIP Code 19110	

B. TRANSFER DATA

Date of Acceptance of Document

Grantor(s)/Lessor(s) Rochelle Bilal, Sheriff		Grantee(s)/Lessee(s) NIS LAR LLC	
Mailing Address Land Title Building 100 South Broad Street 5th Floor		Mailing Address 4323 SPRUCE STREET	
City Philadelphia	State PA	ZIP Code 19110	
		City PHILADELPHIA	State PA
		ZIP Code 19104	

C. REAL ESTATE LOCATION

Street Address 1361 S 46TH ST		City, Township, Borough PHILADELPHIA	
County Philadelphia	School District	Tax Parcel Number 272165800	

D. VALUATION DATA

Was transaction part of an assignment or relocation? ☐ Y ☐ N

1. Actual Cash Consideration \$125,000.00	2. Other Consideration + \$0.00	3. Total Consideration = \$125,000.00
4. County Assessed Value \$85,100.00	5. Common Level Ratio Factor x 1.01	6. Computed Value = \$85,951.00

E. EXEMPTION DATA - Refer to instructions for exemption status.

1a. Amount of Exemption Claimed	1b. Percentage of Grantor's Interest in Real Estate	1c. Percentage of Grantor's Interest Conveyed
---------------------------------	---	---

2. Check Appropriate Box Below for Exemption Claimed.

- ☐ Will or intestate succession. _____
(Name of Descendant) (Estate File Number)
- ☐ Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- ☐ Transfer from a trust. Date of transfer into trust _____
If trust was amended attach a copy of original and amended trust.
- ☐ Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- ☐ Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- ☐ Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- ☐ Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- ☐ Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- ☐ Other (Please explain exemption claimed.) _____

Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party Crystal Martinez	Date 02/03/2020
--	---------------------------

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.

PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION		BOOK NO. _____ PAGE NO. _____
		DATE RECORDED _____
		CITY TAX PAID _____
Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/value is/ is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).		
A. CORRESPONDENT - All inquiries may be directed to the following person:		
NAME Sheriff of the County of Philadelphia		TELEPHONE NUMBER (215) 686-3530
STREET ADDRESS Land Title Building 100 South Broad Street 5th Floor	CITY Philadelphia	STATE PA
		ZIP CODE 19110
B. TRANSFER DATA		
GRANTOR(S)/LESSOR(S) Rochelle Bilal, Sheriff	DATE OF ACCEPTANCE OF DOCUMENT: _____	
GRANTEE(S)/LESSEE(S) NIS LAR LLC		
STREET ADDRESS Land Title Building 100 South Broad Street 5th Floor	STREET ADDRESS 4323 SPRUCE STREET	
CITY Philadelphia	STATE PA	ZIP CODE 19110
	CITY PHILADELPHIA	STATE PA
		ZIP CODE 19104
C. PROPERTY LOCATION		
STREET ADDRESS 1361 S 46TH ST		CITY, TOWNSHIP, BOROUGH PHILADELPHIA
COUNTY PHILADELPHIA	SCHOOL DISTRICT _____	TAX PARCEL NUMBER 272165800
D. VALUATION DATA		
1. ACTUAL CASH CONSIDERATION \$125,000.00	2. OTHER CONSIDERATION + \$0.00	3. TOTAL CONSIDERATION = \$125,000.00
4. COUNTY ASSESSED VALUE \$85,100.00	5. COMMON LEVEL RATIO FACTOR x 1.01	6. FAIR MARKET VALUE = \$85,951.00
E. EXEMPTION DATA		
1A. AMOUNT OF EXEMPTION _____	1B. PERCENTAGE OF INTEREST CONVEYED _____	Transfer Tax: \$3,676.98
2. Check Appropriate Box Below for Exemption Claimed		
<input type="checkbox"/> Will or intestate succession _____ <div style="text-align: center;">(NAME OF DECEDENT) (ESTATE FILE NUMBER)</div>		
<input type="checkbox"/> Transfer to Industrial Development Agency.		
<input type="checkbox"/> Transfer to agent or straw party. (Attach copy of agency/straw party agreement).		
<input type="checkbox"/> Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____		
<input type="checkbox"/> Transfer to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).		
<input type="checkbox"/> Transfer from mortgagor to a holder of a mortgage in a default. Mortgage Book Number _____, Page Number _____ Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).		
<input type="checkbox"/> Corrective deed (Attach copy of the prior deed).		
<input type="checkbox"/> Other (Please explain exemption claimed, if other than listed above.) _____ _____ _____		
Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.		
SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY Crystal Martinez		DATE 2/3/2020

1912-491

LEGAL DESCRIPTION

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected

SITUATE on the Northeasterly side of 46th Street at the distance of 478 feet 4 inches Southeastward from the Southeast side of Woodland Avenue in the 27th Ward of the City of Philadelphia

CONTAINING in front or breadth on the said 46th Street 14 feet 4 inches and extending of that width in length or depth Northeastward 80 feet to a certain alley 3 feet wide

TOGETHER with the free and common use right liberty and privilege of the said alley as and for a passageway and watercourse at all times hereafter forever

TITLE TO SAID PREMISES IS VESTED IN MAY E MCCLOUD AND VERA L JONES by Deed from LEON A WOMACH AND JESSIE WOMACH H/W Dated 03/18/1996 Recorded 06/28/1996 in Book JFD 27 Page 480

OPA Number 272165800

Premises Being 1361 SOUTH 46TH STREET PHILADELPHIA PA 19143 3827

KRIK LAW

1500 John F. Kennedy Boulevard Suite 630
Philadelphia, PA 19102
Phone: 267-831-3180
Fax: 215-309-5502
www.KrikLaw.com

Admitted to PA & NJ Bar

Justin L. Krik, Esquire
jkrik@KrikLaw.com

July 15, 2020

Tenant/Occupant
1361 South 46th Street
Philadelphia, PA 19143

Re: Property: 1361 South 46th Street, Philadelphia, PA 19143
Sheriff Sale Date: January 7, 2020
Successful Purchaser: NIS LAR LLC
NOTICE TO VACATE PURSUANT TO PTFA OF 2009

Dear Sir/Madam:

Please be advised that this office represents the Successful Purchaser of the above referenced Property that was sold at Sheriff Sale of the above date. In the event you are a "bona fide tenant" as defined under the *Protecting Tenants at Foreclosure Act of 2009* ("PTFA"), you are entitled to receive this Notice.

NOT A BONA FIDE TENANT

If you are not a bona fide tenant (i.e., the prior mortgagor, mother, father, or sibling of the prior mortgagor, or otherwise as defined under the PTFA) under the terms of the PTFA then you are not entitled to notice under the PTFA and any protections under the PTFA are not applicable.

NO LEASE/REMAINING LEASE TERM LESS THAN 90 DAYS

If you are a bona fide tenant without a written lease or a written lease terminable in less than 90 days, then you are hereby notified that any such lease interest is hereby terminated at the end of this 90-day notice period and that the Successful Purchaser will proceed with its rights under State Law and at the expiration of the 90 days or thereafter to have you removed from the Property. This Notice constitutes your 90-day notice.

REMAINING LEASE TERM GREATER THAN 90 DAYS

If you are a bona fide tenant prior to the notice of foreclosure, then you may continue to occupy the Property until the end of the remaining current term of the lease. (Any optional right to add any additional terms to the lease is hereby terminated.) You must continue to abide by the provisions of the lease and continue to make lease payments to the Successful Purchaser. You are hereby put on Notice that at the end of the remaining current term of the lease, which amount

of time is greater than 90 days, or thereafter, we will request to have you removed from the Property. This Notice constitutes your notice that your right to occupy the Property under PTFA expires at the end of the lease term.

You must provide our office with a copy of the written lease. If you do not have a written lease then under the law of the state, you are a tenant-at-will with only a month to month tenancy. If you do not provide a lease within 10 days from the date of this notice, then you will be treated appropriately as not being a bona fide tenant subject to protection under PTFA or, alternatively, as having no lease or a lease terminable in less than 90 days.

Further, if you default under the terms of the lease, then it shall be considered terminated and this notice shall constitute your notice under the PTFA to vacate the Property and that the Successful Purchaser (or any successor-in-interest) shall request to have you removed from the Property at the expiration of 90 days, from the date of this Notice, or the default of the lease, whichever date is later.

Notwithstanding, if the Successful Purchaser sells the Property to a purchaser who will occupy the Property as a primary residence then you are put on notice that at the expiration of 90 days from the date of this Notice you may be removed from the Property and the lease will be terminated effective the date of the sale of the Property.

LEGAL PROCEEDINGS

The Successful Purchaser reserves the right to begin/institute legal proceedings to remove the occupant/tenant from the Property at any time, even prior to the expiration of the Notice provided, but will not schedule a lockout or exercise a writ of possession until after the expiration of the applicable Notice period.

Should you have any questions or comments, please feel free to contact my office.

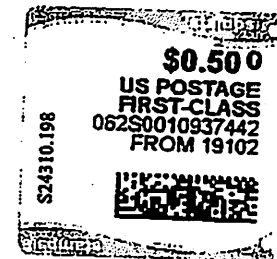
Very truly yours,

/s/ Justin L. Krik

JUSTIN L. KRIK, ESQUIRE

JLK/dt

Krik Law
1500 JFK Blvd., Suite 630
Philadelphia, PA 19102



Tenant/Occupant
1361 South 46th Street
Philadelphia, PA 19143

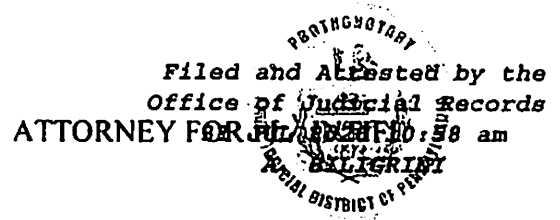
Exhibit “3”

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)	
JULY 2020	002235
E-Filed Number: 200-7061136	

PLAINTIFF'S NAME NIS LAR LLC		DEFENDANT'S NAME JOHN DOE	
PLAINTIFF'S ADDRESS 4323 SPRUCE STREET PHILADELPHIA PA 19104		DEFENDANT'S ADDRESS 1361 SOUTH 46TH STREET PHILADELPHIA PA 19143	
PLAINTIFF'S NAME		DEFENDANT'S NAME UNKNOWN OCCUPANT	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 1361 SOUTH 46TH STREET PHILADELPHIA PA 19143	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input checked="" type="checkbox"/> Other: <u>RENT, LEASE & EJECTMENT</u>		
CASE TYPE AND CODE 3S - EJECTMENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PROPROTHY JUL 31 2020 A. SILIGRINI	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>NIS LAR LLC</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFFS/PETITIONERS/APPELLANT'S ATTORNEY JUSTIN L. KRIK		ADDRESS 1500 JOHN F KENNEDY BLVD SUITE 630 PHILADELPHIA PA 19102	
PHONE NUMBER (267) 831-3180	FAX NUMBER (215) 309-5502		
SUPREME COURT IDENTIFICATION NO. 203006		E-MAIL ADDRESS jkrik@kriklaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY JUSTIN KRIK		DATE SUBMITTED Friday, July 31, 2020, 10:58 am	

KRIK LAW
 BY: JUSTIN L. KRIK, ESQUIRE
 ATTORNEY ID NO: 203006
 1500 JOHN F. KENNEDY BLVD., STE. 630
 PHILADELPHIA, PA 19102
 PHONE: (267) 831-3180
 FAX: (215) 309-5502



NIS LAR LLC	:	COURT OF COMMON PLEAS
4323 Spruce Street	:	PHILADELPHIA COUNTY
Philadelphia, PA 19104	:	
Plaintiff,	:	
v.	:	TERM,
	:	
	:	NO.:
JOHN DOE	:	
1361 South 46 th Street	:	
Philadelphia, PA 19143	:	
and	:	
UNKNOWN OCCUPANT	:	
1361 South 46 th Street	:	
Philadelphia, PA 19143	:	
Defendant(s).	:	

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
 Lawyer Referral and Information Service
 1101 Market Street - 11th Floor
 Philadelphia, PA 19107
 Telephone: (215) 238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**Asociacion De Licenciados De Filadelfia
Servicio de Referencia E Informacion Legal
1101 Market Street-11th Floor
Filadelfia, PA 19107
Telefono: (215) 238-6333**

KRIK LAW
 BY: JUSTIN L. KRIK, ESQUIRE
 ATTORNEY ID NO: 203006
 1500 JOHN F. KENNEDY BLVD., STE. 630
 PHILADELPHIA, PA 19102
 PHONE: (267) 831-3180
 FAX: (215) 309-5502

ATTORNEY FOR PLAINTIFF

NIS LAR LLC	:	COURT OF COMMON PLEAS
4323 Spruce Street	:	PHILADELPHIA COUNTY
Philadelphia, PA 19104	:	
Plaintiff,	:	
v.	:	TERM,
	:	
	:	NO.:
JOHN DOE	:	
1361 South 46 th Street	:	
Philadelphia, PA 19143	:	
and	:	
UNKNOWN OCCUPANT	:	
1361 South 46 th Street	:	
Philadelphia, PA 19143	:	
Defendant(s).	:	

CIVIL ACTION
COMPLAINT IN EJECTMENT

1. Plaintiff, NIS LAR LLC ("Plaintiff") is a Limited Liability Company with an address as stated above.
2. Defendants, JOHN DOE and UNKNOWN OCCUPANT, upon information and belief, are adult individuals occupying at 1361 SOUTH 46TH STREET, PHILADELPHIA, PA 19143 (hereinafter the "Premises").
3. On January 7, 2020, the Premises was sold at a City of Philadelphia Mortgage Foreclosure Sale to Plaintiff in accordance with the law (Philadelphia CCP Matrix Financial Services Corporation v. May E. Cloud and Vera L. Jones, May Term, 2017, No.: 3419). A true correct copy of the legal description to the Premises and abstract of title is attached hereto and made a part hereof as Exhibit "A".

4. Plaintiff became record owner of the Premises on March 16, 2020, having acquired title by Deed from Rochelle Bilal, Sheriff of the County of Philadelphia, recorded by the Commissioner of Records of the City of Philadelphia on March 16, 2020 at Document Identification Number 53646252 (the “Deed”). A true and correct copy of the Deed is attached hereto and made a part hereof as Exhibit “B”.

5. Notice to Vacate Pursuant to PTFA of 2009 was mailed the Defendants on July 15, 2020 via regular mail. As of the date of this filing, Defendants have not responded and continue to occupy the property.

6. By virtue of the Deed, Plaintiffs have paramount title to the Premises over Defendants.

7. Defendants, John Doe and Unknown Occupant, have no right, title or interest in the Premises.

8. Plaintiffs have the right to immediate and exclusive possession of the Premises by virtue of the Deed, as set forth above.

9. Despite demand, Defendants, John Doe and Unknown Occupant, continue to assert his/her/their right to possession of the Premises.

WHEREFORE, Plaintiff, NIS LAR LLC, requests judgment for immediate and exclusive possession of the Premises located at 1361 SOUTH 46TH STREET, PHILADELPHIA, PA 19143 as to Defendant, John Doe and Unknown Occupant, and as to any and all other parties who may

claim right, title or interest to said Premises, and grant such further relief as may be just and equitable.

KRIK LAW

BY: /s/ Justin L. Krik
JUSTIN L. KRIK, ESQUIRE
ATTORNEY FOR PLAINTFF

DATE: July 31, 2020

VERIFICATION

NIS LAR LLC hereby states that he is a Plaintiff in this action and verifies that the statements made in the foregoing **COMPLAINT IN EJECTMENT** are based on firsthand information and on information furnished to counsel and obtained in the course of this lawsuit. The language of the **COMPLAINT IN EJECTMENT** is that of counsel and not of the affiant. To the extent that the contents of the **COMPLAINT IN EJECTMENT** are based on information furnished to counsel and obtained by him during the course of this lawsuit, the affiant has relied upon counsel in taking this verification. All statements are founded upon reasonable belief. This verification is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

NIS LAR LLC

By: _____

Title: _____

DATED: July 31, 2020

EXHIBIT “A”

1912-491

LEGAL DESCRIPTION

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected

SITUATE on the Northeasterly side of 46th Street at the distance of 478 feet 4 inches Southeastward from the Southeast side of Woodland Avenue in the 27th Ward of the City of Philadelphia

CONTAINING in front or breadth on the said 46th Street 14 feet 4 inches and extending of that width in length or depth Northeastward 80 feet to a certain alley 3 feet wide

TOGETHER with the free and common use right liberty and privilege of the said alley as and for a passageway and watercourse at all times hereafter forever

TITLE TO SAID PREMISES IS VESTED IN MAY E MCCLOUD AND VERA L JONES by Deed from LEON A WOMACH AND JESSIE WOMACH H/W Dated 03/18/1996 Recorded 06/28/1996 in Book JFD 27 Page 480

OPA Number 272165800

Premises Being 1361 SOUTH 46TH STREET PHILADELPHIA PA 19143 3827

EXHIBIT “B”

eRecorded in Philadelphia PA Doc Id: 53646252
03/16/2020 12:37 PM Page 1 of 6 Rec Fee: \$256.75
Receipt#: 20-29523
Records Department Doc Code: DS
State RTT: \$859.51 Local RTT: \$2,817.47

1912-491

Know all Men by these Presents

THAT I, Rochelle Bilal, Sheriff of the County of Philadelphia in the Commonwealth of Pennsylvania, for and in consideration of the sum of ONE HUNDRED TWENTY-FIVE THOUSAND AND XX / 100 [S125,000.00] dollars, to me in hand paid, do hereby grant and convey to NIS LAR LLC .

DESCRIPTION

BRT#: 272165800

Premises Being: 1361 S 46TH ST, PHILADELPHIA, PA 19143-3827

SEE ATTACHED LEGAL DESCRIPTION

The same having been sold, on the 7th day of January Anno Domini Two Thousand Twenty, after due advertisement, according to the law, under and by virtue of a Writ of Execution/DECREE issued out of the Court of Common Pleas as of May Term, Two Thousand Seventeen Number 3419 as the suit of:

MATRIX FINANCIAL SERVICES CORPORATION

VS.

MAY E. MCCLOUD AND VERA L. JONES

In witness whereof, I have hereunto affixed my signature this 3rd day of February Anno Domini Two Thousand Twenty.

**SEALED AND DELIVERED
IN THE PRESENCE OF:**

Richard Tyer

Witness

Rochelle Bilal, SHERIFF

BY

Jeffrey Hanison

Witness

Sommer Miller

Sommer Miller, Undersheriff

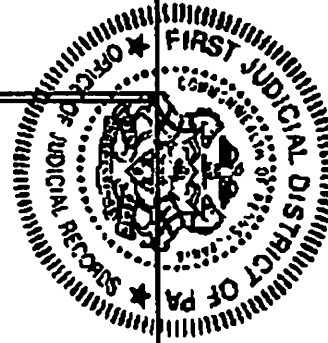
Commonwealth of Pennsylvania :
County of Philadelphia :

On this, the 03 Feb 2020, before me, the undersigned Officer, personally appeared ROCHELLE BILAL, BY HIS/HER UNDERSHERIFF SOMMER MILLER, Sheriff of the County of Philadelphia, known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he/she executed the same in the capacity therein stated and for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

Steven J. Wulko

Office of Judicial Records
Steven J. Wulko, Deputy Director



Book No. 1912
Writ No. 491
Control No. _____

Deed = Poll

Rochelle Bilal, SHERIFF

TO

NIS LAR LLC

MATRIX FINANCIAL SERVICES CORPORATION

VS.

MAY E. MCCLOUD AND VERA L. JONES

May. T. 2017

No. 3419

Premises:
1361 S 46TH ST
PHILADELPHIA, PA19143-3827

The Address of the within-named Grantee

4323 SPRUCE STREET

PHILADELPHIA, PA19104

On behalf of the Grantee

Rochelle Bilal, SHERIFF

Philadelphia Sheriff Office

Sheriff of the County of Philadelphia
Chief Inspector Richard Verrecchio
Witness
Real Estate/Settlement Dept.
Land Title Building
100 South Broad Street 5th Floor
Philadelphia, PA19110



pennsylvania
DEPARTMENT OF REVENUE

Bureau of Individual Taxes
PO BOX 280603
Harrisburg, PA 17128-0603

53646252 Page 4 of ~~RECORDED~~ **1187 ONLY**
REALTY TRANSFER TAX
STATEMENT OF VALUE

See reverse for instructions.

State Tax Paid

Book Number

Page Number

Date Recorded

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) the deed is without consideration or by gift, or (3) a tax exemption is claimed. If more space is needed, please attach additional sheets. A Statement of Value (SOV) is not required if the transfer is wholly exempt from tax based on family relationship or public utility easement. However, it is recommended that a SOV accompany all documents filed for recording.

A. CORRESPONDENT - All inquiries may be directed to the following person:

Name Sheriff of the County of Philadelphia		Telephone Number (215) 686-3530	
Mailing Address Land Title Building 100 South Broad Street 5th Floor		City Philadelphia	State ZIP Code PA 19110

B. TRANSFER DATA

Date of Acceptance of Document

Grantor(s)/Lessor(s) Rochelle Bilal, Sheriff			Grantee(s)/Lessee(s) NIS LAR LLC		
Mailing Address Land Title Building 100 South Broad Street 5th Floor			Mailing Address 4323 SPRUCE STREET		
City Philadelphia	State PA	ZIP Code 19110	City PHILADELPHIA	State PA	ZIP Code 19104

C. REAL ESTATE LOCATION

Street Address 1361 S 46TH ST		City, Township, Borough PHILADELPHIA	
County Philadelphia	School District	Tax Parcel Number 272165800	

D. VALUATION DATA

Was transaction part of an assignment or relocation? ☐ Y ☐ N

1. Actual Cash Consideration \$125,000.00	2. Other Consideration + \$0.00	3. Total Consideration = \$125,000.00
4. County Assessed Value \$85,100.00	5. Common Level Ratio Factor x 1.01	6. Computed Value = \$85,951.00

E. EXEMPTION DATA - Refer to instructions for exemption status.

1a. Amount of Exemption Claimed	1b. Percentage of Grantor's Interest in Real Estate	1c. Percentage of Grantor's Interest Conveyed
---------------------------------	---	---

2. Check Appropriate Box Below for Exemption Claimed.

- ☐ Will or intestate succession. _____
(Name of Descendant) (Estate File Number)
- ☐ Transfer to a trust. (Attach complete copy of trust agreement identifying all beneficiaries.)
- ☐ Transfer from a trust. Date of transfer into trust _____
If trust was amended attach a copy of original and amended trust.
- ☐ Transfer between principal and agent/straw party. (Attach complete copy of agency/straw party agreement.)
- ☐ Transfers to the commonwealth, the U.S. and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (If condemnation or in lieu of condemnation, attach copy of resolution.)
- ☐ Transfer from mortgagor to a holder of a mortgage in default. (Attach copy of mortgage and note/assignment.)
- ☐ Corrective or confirmatory deed. (Attach complete copy of the deed to be corrected or confirmed.)
- ☐ Statutory corporate consolidation, merger or division. (Attach copy of articles.)
- ☐ Other (Please explain exemption claimed.) _____

Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

Signature of Correspondent or Responsible Party
Crystal Martinez

Date
02/03/2020

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH REQUESTED DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.

Case ID: 200702235

PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION		BOOK NO. _____ PAGE NO. _____	
		DATE RECORDED _____	
		CITY TAX PAID _____	
Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/value is/is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).			
A. CORRESPONDENT - All inquiries may be directed to the following person:			
NAME Sheriff of the County of Philadelphia		TELEPHONE NUMBER (215) 686-3530	
STREET ADDRESS Land Title Building 100 South Broad Street 5th Floor		CITY Philadelphia	STATE PA
		ZIP CODE 19110	
B. TRANSFER DATA		DATE OF ACCEPTANCE OF DOCUMENT: _____	
GRANTOR(S)/LESSOR(S) Rochelle Bilal Sheriff		GRANTEE(S)/LESSEE(S) NIS LAR LLC	
STREET ADDRESS Land Title Building 100 South Broad Street 5th Floor		STREET ADDRESS 4323 SPRUCE STREET	
CITY Philadelphia	STATE PA	CITY PHILADELPHIA	STATE PA
	ZIP CODE 19110		ZIP CODE 19104
C. PROPERTY LOCATION			
STREET ADDRESS 1361 S 46TH ST		CITY, TOWNSHIP, BOROUGH PHILADELPHIA	
COUNTY PHILADELPHIA	SCHOOL DISTRICT _____	TAX PARCEL NUMBER 272165800	
D. VALUATION DATA			
1. ACTUAL CASH CONSIDERATION \$125,000.00		2. OTHER CONSIDERATION + \$0.00	
		3. TOTAL CONSIDERATION = \$125,000.00	
4. COUNTY ASSESSED VALUE \$85,100.00		5. COMMON LEVEL RATIO FACTOR x 1.01	
		6. FAIR MARKET VALUE = \$85,951.00	
E. EXEMPTION DATA			
1A. AMOUNT OF EXEMPTION _____		1B. PERCENTAGE OF INTEREST CONVEYED _____	
		Transfer Tax: \$3,676.98	
2. Check Appropriate Box Below for Exemption Claimed			
<input type="checkbox"/> Will or Intestate succession _____ <div style="text-align: center;">(NAME OF DECEDENT) (ESTATE FILE NUMBER)</div>			
<input type="checkbox"/> Transfer to Industrial Development Agency.			
<input type="checkbox"/> Transfer to agent or straw party. (Attach copy of agency/straw party agreement).			
<input type="checkbox"/> Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____			
<input type="checkbox"/> Transfer to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).			
<input type="checkbox"/> Transfer from mortgagor to a holder of a mortgage in a default. Mortgage Book Number _____, Page Number _____ Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).			
<input type="checkbox"/> Corrective deed (Attach copy of the prior deed).			
<input type="checkbox"/> Other (Please explain exemption claimed, if other than listed above.) _____ _____ _____			
Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.			
SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY Crystal Martinez			DATE 2/3/2020

1912-491

LEGAL DESCRIPTION

ALL THAT CERTAIN lot or piece of ground with the buildings and improvements thereon erected

SITUATE on the Northeasterly side of 46th Street at the distance of 478 feet 4 inches Southeastward from the Southeast side of Woodland Avenue in the 27th Ward of the City of Philadelphia

CONTAINING in front or breadth on the said 46th Street 14 feet 4 inches and extending of that width in length or depth Northeastward 80 feet to a certain alley 3 feet wide

TOGETHER with the free and common use right liberty and privilege of the said alley as and for a passageway and watercourse at all times hereafter forever

TITLE TO SAID PREMISES IS VESTED IN MAY E MCCLOUD AND VERA L JONES by Deed from **LEON A WOMACH AND JESSIE WOMACH H/W** Dated 03/18/1996 Recorded 06/28/1996 in Book JTD 27 Page 480

OPA Number 272165800

Premises Being 1361 SOUTH 46TH STREET PHILADELPHIA PA 19143 3827

Exhibit “4”



235 SOUTH 13TH STREET
PHILADELPHIA, PA 19107
PHONE: (215) 546-7400
FAX: (215) 985-0169



National Association of
Professional Process Servers

Nis Lar LLC

-VS-

John Doe

COURT Court of Common Pleas of Pennsylvania

Philadelphia County Civil

Filed and Attested by the

Office of Judicial Records

CASE NUMBER 200702235 SEP 2020 11:44 am

AFFIDAVIT

State of Pennsylvania
County of Philadelphia

B&R Control # CS174078.01

Reference Number 425

Thomas Kenney, being duly sworn according to law, deposes and says that he/she is the process server/sheriff herein named, and that the facts set forth below are true and correct to the best of their knowledge, information and belief.

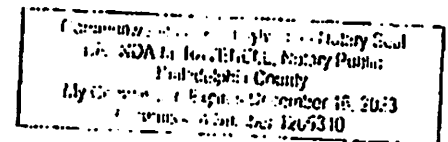
On 8/4/2020 we received the **Complaint - Civil Action** and that service was effected upon **John Doe** at **1361 SOUTH 46TH STREET, PHILADELPHIA, PA 19143** on **8/27/2020** at **1:05 PM**, in the manner described below:

By service upon: An adult in charge of residence who refused to provide their name and relationship.

Description:

Gender: **FEMALE** Race/Skin: **BLACK** Age: **50 - 60 Yrs** Weight: **131-160 Lbs.** Height: **5ft4in - 5ft8in**
Hair: **BLACK** Glasses: **No** Other:

Service Notes:



Process Server/Sheriff

Sworn to and subscribed before me this

8th day of Sept 2020

Thomas Kenney
Notary Public

ATTEMPTS:

08/12/2020 08:10 PM 1361 SOUTH 46TH STREET, PHILADELPHIA, PA 19143 NO RESPONSE.

08/22/2020 11:43 AM 1361 SOUTH 46TH STREET, PHILADELPHIA, PA 19143 SATURDAY ATTEMPT NO RESPONSE

Client Phone (267) 831-3180

Filed Date: 07/31/2020 BR Serve By: 08/28/2020

Diana Thompson, Paralegal
Krik Law
2 Penn Center, Ste. 630
1500 JFK Boulevard
Philadelphia, PA 19102



ORIGINAL

Case ID: 200702235



235 SOUTH 13TH STREET
PHILADELPHIA, PA 19107
PHONE: (215) 546-7400
FAX: (215) 985-0169



National Association of
Professional Process Servers

Nis Lar LLC

-VS-

John Doe

COURT Court of Common Pleas of Pennsylvania
Philadelphia County Civil
Filed and Attested by the
Office of Judicial Records

CASE NUMBER 200702235P 2020 10:51 am

AFFIDAVIT

State of Pennsylvania
County of Philadelphia

B&R Control # CS174078.02
Reference Number 425

Thomas Kenney, being duly sworn according to law, deposes and says that he/she is the process server/sheriff herein named, and that the facts set forth below are true and correct to the best of their knowledge, information and belief.

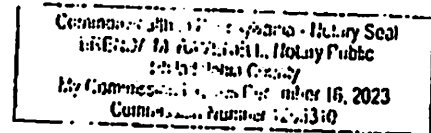
On 8/4/2020 we received the Complaint - Civil Action and that service was effected upon Unknown Occupant at 1361 SOUTH 46TH STREET, PHILADELPHIA, PA 19143 on 8/27/2020 at 1:05 PM, in the manner described below:

By service upon: An adult in charge of residence who refused to provide their name and relationship.

Description:

Gender: FEMALE Race/Skin: BLACK Age: 50 - 60 Yrs Weight: 131-160 Lbs. Height: 5ft4in - 5ft8in
Hair: BLACK Glasses: No Other:

Service Notes:



Sworn to and subscribed before me this

8th day of Sept 2020

Benjamin C. Kenney
Notary Public

Process Server/Sheriff

ATTEMPTS:

08/12/2020 08:10 PM 1361 South 46th Street, Philadelphia, PA 19143 NO RESPONSE

08/22/2020 11:43 AM 1361 South 46th Street, Philadelphia, PA 19143 SATURDAY ATTEMPT. NO RESPONSE.

Client Phone (267) 831-3180

Filed Date: 07/31/2020 BR Serve By: 08/28/2020

Diana Thompson, Paralegal
Krik Law
2 Penn Center, Ste. 630
1500 JFK Boulevard
Philadelphia, PA 19102



ORIGINAL

Case ID: 200702235

Exhibit “5”

KRIK LAW

BY: JUSTIN L. KRIK, ESQUIRE

ATTORNEY ID NO: 203006

1500 JOHN F. KENNEDY BLVD., STE. 630

PHILADELPHIA, PA 19102

PHONE: (267) 831-3180

FAX: (215) 309-5502

ATTORNEY FOR PLAINTIFF

NIS LAR LLC

Plaintiff,

v.

JOHN DOE

and

UNKNOWN OCCUPANT

Defendant(s).

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

JULY TERM, 2020

NO.: 002235

IMPORTANT NOTICE

TO: JOHN DOE

1316 South 46th Street

Philadelphia, PA 19143

DATE OF NOTICE: September 23, 2020

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
1101 MARKET STREET - 11TH FLOOR
PHILADELPHIA, PA 19107
TELEPHONE: (215) 238-6333**

KRIK LAW

**BY: /s/ Justin L. Krik
JUSTIN L. KRIK, ESQUIRE
ATTORNEY FOR PLAINTIFF**

KRIK LAW
BY: JUSTIN L. KRIK, ESQUIRE
ATTORNEY ID NO: 203006
1500 JOHN F. KENNEDY BLVD., STE. 630
PHILADELPHIA, PA 19102
PHONE: (267) 831-3180
FAX: (215) 309-5502

ATTORNEY FOR PLAINTIFF

NIS LAR LLC	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
	:	
v.	:	JULY TERM, 2020
	:	
	:	NO.: 002235
JOHN DOE	:	
and	:	
UNKNOWN OCCUPANT	:	
Defendant(s).	:	

IMPORTANT NOTICE

TO: UNKNOWN OCCUPANT
1316 South 46th Street
Philadelphia, PA 19143

DATE OF NOTICE: September 23, 2020

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
1101 MARKET STREET - 11TH FLOOR
PHILADELPHIA, PA 19107
TELEPHONE: (215) 238-6333**

KRIK LAW

BY: /s/ Justin L. Krik
**JUSTIN L. KRIK, ESQUIRE
ATTORNEY FOR PLAINTIFF**

Exhibit “6”

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
Court of Common Pleas of Philadelphia County
Trial Division

NIS LAR LLC	:	JULY TERM, 2020
vs.	:	
JOHN DOE, ET AL	:	No. 002235

**PLAINTIFF'S AFFIDAVIT IN CONNECTION WITH THE CDC ORDER AND TEMPORARY
HALT IN EVICTIONS TO PREVENT FURTHER SPREAD OF COVID-19**

This Affidavit is being filed in connection with the Centers for Disease Control and Prevention ("CDC") Order issued on September 1, 2020, and will be used by the Court to determine whether this action will be stayed until December 31, 2020 pursuant to the CDC Order, or will proceed as provided by rules of Court.

I represent as follows:

(Check One)

- ☐ This action is solely for failure to pay rent. I have received the CDC Declaration from the Tenant/Defendant. I understand that further proceedings will be stayed until 12/31/20.
- ☐ This action is solely for failure to pay rent. I have not received a Declaration from the Tenant/Defendant. I understand that the CDC stay will not be issued and that the case will proceed as provided by rules of Court.
- ☐ This action is solely for failure to pay rent. I have received the CDC Declaration from the Tenant/Defendant, but I dispute the Tenant's entitlement to the stay because the Tenant does not meet the CDC requirements. However, I understand that this action will be stayed unless I file a motion setting forth why the Tenant does not meet the CDC requirements and obtain an order of Court lifting the stay.
- ☐ This action is for failure to pay rent and for breach(es) of condition(s) of the lease or other reasons. I understand that this case is not stayed and that it proceeds to breach(es) of the lease or other reasons.
- ☒ This action is not subject to the stay required by the September 1, 2020 CDC Order due to the following reason(s): Action in Ejectment of unauthorized occupancy,
no landlord/tenant relationship.

I understand that this case will proceed as provided by rules of court.

I, being duly sworn according to law, depose and say that I am the Plaintiff/Plaintiff's Attorney in this action and that the facts and statements I have are true and correct to the best of my knowledge, information and belief.

I verify that the statements made are true and correct. I understand that any false statements I have made in this *Motion* are subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: 10/16/2020 | 6:50 PDT

DocuSigned by:

Guy Laren

DCABE0945B074CF

NAME OF PLAINTIFF/PLAINTIFF'S ATTORNEY

UNKNOWN OCCUPANT
1361 SOUTH 46TH STREET
PHILADELPHIA, PA 19143

NIS LAR LLC VS DOE ETAL
200702235



FILED
06 NOV 2020 02:05 pm
Civil Administration
F. HEWITT

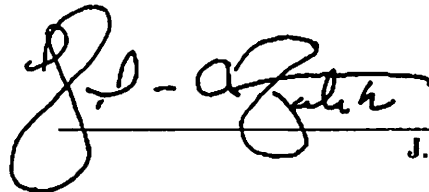
NIS LAR LLC	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
	:	
v.	:	JULY TERM, 2020
	:	
	:	NO.: 002235
JOHN DOE	:	
and	:	
UNKNOWN OCCUPANT	:	
Defendant(s).	:	

ORDER

AND NOW this 2nd day of December, 2020, upon consideration of Plaintiff's Motion for Default Judgment and Order Upon Judgment of Default in accordance with Pa.R.C.P. 1037(c) and (d) and response thereto, it is hereby ORDERED and DECREED as follows:

1. Judgment is hereby entered in favor Plaintiff, NIS LAR LLC, and against Defendants, JOHN DOE AND UNKNOWN OCCUPANTS, upon default for failure to timely plead to Plaintiff's Complaint; and
2. The Prothonotary, upon Plaintiff's praecepe, shall issue a Writ of Possession for the Subject Premises located at 1361 South 46th Street, Philadelphia, PA 19143.

BY THE COURT:


J.

Nis Lar Llc Vs Doe Etal-WSJDE



20070223500009